

June 14, 2019

Ms. Marlene Dortch  
Secretary, Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Dear Secretary Dortch:

On behalf of the National Council for Behavioral Health, I am writing to urge the FCC to support the designation or repurposing of an N11 dialing code for the purposes of a national suicide prevention and mental health crisis hotline system. The National Council is the unifying voice of America's health care organizations that deliver mental health and addictions treatment and services. Together with our 3,100 member organizations serving over 10 million adults, children and families living with mental illnesses and addictions, the National Council is committed to all Americans having access to comprehensive, high-quality care that affords every opportunity for recovery.

An easy-to-remember 3-digit phone number for a national suicide prevention and mental health hotline would increase public access to life saving crisis resources. The Overall Recommendation of the North American Numbering Council's (NANC's) Report to the FCC, to expand the 211 code to include crisis and suicide prevention calling services, would betray the intent of the National Suicide Hotline Improvement Act and squander an opportunity to improve our country's suicide and mental health crisis systems.

The mental health and the public safety of Americans deserves a sole-purpose hotline number for people in crisis. Expanding the 211 code, which currently is designated for information and referral services (like utility assistance and employment opportunities), to include the responsibilities of mental health and suicide crisis response services diminishes the issues that communities across the country are facing. Suicide is the second leading cause of death for ages 10-34, the fourth leading cause of death for ages 35-54, and the tenth leading cause of death overall in the United States. Every year, over 10 million people seriously consider suicide, over 1 million attempt suicide, and in 2017 over 47,000 Americans completed suicide.

The scope of our mental health and suicide crises demands a dedicated dialing code without a dual-purpose. Individuals in suicidal crisis are in life-and-death emergencies, emergencies which require rapid, appropriate responses. Designating 211 to handle these types of emergencies, in conjunction with their non-emergency duties, would present a life-threatening disservice to callers in crisis. NANC's Report listed the alarming disadvantages of expanding the 211 code –

that a caller in crisis may have less timely access to experienced assistance, that call centers would be unprepared to handle a crisis call, inclusion of an Interactive Voice Response System (IVR) to assess the urgency of incoming calls leading to increased call wait times – that the Commission should not take lightly.

The historic opportunity before the Commission to improve America’s crisis response network should not be wasted by expanding a current N11 code or by designating a new non-N11 number – which the NANC Report stated would not be deployed ubiquitously across the country.

National Council urges the FCC to designate a currently undesignated, or repurpose a currently designated, N11 code for the sole-purpose of a national suicide prevention and mental health hotline. Establishing a ubiquitous, recognizable national number (similar to 411 or 911) for mental health and suicide prevention would be a transformative step for our nation’s public health by making crisis resources more accessible, by addressing the deeply entrenched stigma associated with mental health conditions, and by relieving burden on other emergency or health systems. Whether an undesignated N11 number (611) or a designated, low-use N11 number (511), we urge you to assign an N11 dialing code as a dedicated, sole-purpose number to respond to our mental health and suicide public health crises.

We thank the FCC for allowing concerned citizens, mental health professionals, and crisis service representatives to comment on this critical issue. We will not get another opportunity to so dramatically improve the way our country responds to and serves people in emotional and suicidal crisis. We urge you to support the designation or repurposing of a sole-purpose N11 dialing code to connect the millions of Americans living with mental health conditions and suicidal thoughts with the services they need.

The National Council appreciates the opportunity to provide comments on this issue. If you have any questions, please contact me at [chucki@thenationalcouncil.org](mailto:chucki@thenationalcouncil.org) or (202)684-3749. Thank you for your time and consideration.

Sincerely,



Charles Ingoglia, MSW  
President and CEO  
National Council for Behavioral Health